

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

**WANDA RENA CHRISTIAN and
DORIS BRICE,**

Plaintiffs

vs.

**AUTO-OWNERS INSURANCE
COMPANY,**

Defendant.

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Civil Action No. _____

NOTICE OF REMOVAL

Defendant, Auto-Owners Insurance Company, hereby gives notice of removal of an action instituted by the above-named Plaintiffs, Wanda Rena Christian and Doris Brice, and respectfully shows unto this Honorable Court in the United States District Court, Eastern District of Tennessee, at Greeneville, the following:

1. This Notice of Removal is filed pursuant to provision 28 U.S.C. §§ 1332, 1441, et seq.

2. This action was originally filed on November 18, 2013 in the Circuit Court for Sullivan County, Kingsport, Tennessee, as Civil Action No. C40404(C).

3. The Summons and Complaint were served on Defendant through the Department of Commerce and Insurance on November 27, 2013.

4. This Notice of Removal is being filed within thirty (30) days after the date that Defendant was served with copies of the Summons and Complaint.

5. Defendant is a Michigan corporation with its principle place of business located in Lansing, Michigan. Plaintiffs, as alleged in their Complaint, are citizens of Sullivan County, Tennessee.

6. The citizenship of the respective parties was the same at the time of commencement of this action against the Defendant in the Circuit Court for Sullivan County, Kingsport, Tennessee and on the date of filing this petition for removal.

7. Plaintiffs' claim is a civil action over which this Court has original jurisdiction under 28 U.S.C. § 1332, as there is complete diversity of citizenship between the Plaintiffs and the Defendant and more than \$75,000.00 is in controversy, exclusive of interests and costs. This case is one which Defendant is entitled to remove to this Court pursuant to 28 U.S.C. §§ 1441(a) and (b).

8. Defendant files with this Notice of Removal a copy of the following documents:

- Ex. A. — Summons and Complaint filed in the Sullivan County Circuit Court at Kingsport, Tennessee on November 18, 2013;
- Ex. B — Notice to Plaintiff of Filing of Notice of Removal;
- Ex. C — Notice to State Court of Filing of Notice of Removal; and
- Ex. D — Certificate of Service

WHEREFORE, Defendant prays this Honorable Court to accept this Notice of Removal and proceed with this action in accordance with law.

Dated this the 23rd day of December, 2013.

AUTO-OWNERS INSURANCE COMPANY

BY: Christopher D. Owens
Christopher D. Owens
HUNTER, SMITH & DAVIS, LLP
100 Med Tech Parkway, Suite 110
Johnson City, TN 37604
TN BPR No. 020512; VA Bar No. 46402;
KY Bar No. 95234
(423) 283-6312; Fax: (423) 283-6301